

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13CV254 HSO-RHW

JOHN DOE(S) AKA "RANDALL CAJUN"

DEFENDANTS

**MEMORANDUM BRIEF IN SUPPORT OF MOTION OF DEFENDANTS,
CHARLES LEARY, VAUGHAN PERRET, FOR PROTECTIVE ORDER**

On June 14, 2013 Charles Leary and Vaughan Perret filed their Motion to Dismiss [Docket No: 2] and on July 17, 2013 Charles Leary and Vaughan Perret filed their Brief in Support of Motion to Dismiss [Docket No: 7].

On or about July 16, 2013 Plaintiff, Douglas Handshoe, served counsel for Charles Leary, and Vaughan Perret with:

1. Plaintiff's Interrogatories to be Answered by Defendants Under Oath;
2. Plaintiff's Request for Production of Documents to be Responded to by Defendant Under Oath; and
3. Plaintiff's Request for Admission of Facts.

By filing his discovery requests, the Plaintiff has totally ignored Federal Rule of Civil Procedure 26, pretrial discovery and initial disclosure procedure, Local Rule 26(a) requiring

initial disclosures prior to discovery, Local Rule 26(b) commencement and completion of discovery, and Local Rule 26(e) case management procedures.

Accordingly, Movants request the Court to enter a Protective Order relieving them from the necessity of responding to Plaintiff's discovery requests unless and until the Court permits discovery to go forward.

RESPECTFULLY SUBMITTED this the 25th day of July, 2013.

CHARLES LEARY and VAUGHAN
PERRET

By: s/ Henry Laird
Henry Laird, MS Bar No. 1774

CERTIFICATE OF SERVICE

I, Henry Laird, of the law firm of Jones Walker LLP do hereby certify that I have sent a true and correct copy of the foregoing Brief in Support of Motion to for Protective Order by using the ECF system to the following:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 39520
VIA UNITED STATES MAIL AND EMAIL: earning04@gmail.com

This the 25th day of July, 2013.

s/ Henry Laird

Henry Laird

Henry Laird (MSB No. 1774)
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